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50.- SUBMISSIONS

1.- To declare that the Tribunal has jurisdiction under article 292 of the United Nations Convention on the Law of the Sea to hear the present application .

2.- To declare the present application admissible.

3.- To declare that France failed to comply with article 73, paragraph 2, of the Convention, as the guarantee fixed for release of Grand Prince is not reasonable as to its amount, nature or form.

4.- To declare that France failed to comply with article 73, paragraph 2, of the Convention by having evaded the requirement of prompt release under this article by not allowing the release of the vessel upon the posting of a reasonable, or any kind, of guarantee alleging that the vessel is confiscated and that the decision of confiscation has been provisionally executed.

5.- To decide that France shall promptly release the Grand Prince upon the posting of a bond or other security to be determined by the Tribunal

6.- To determine that the bond or other security shall consist of an amount of two hundred and six thousand one hundred forty nine (206,149) Euros or its equivalent if French Francs.

7.- To determine that the monetary equivalent to (a) 18 tones of fish on board the Grand Prince held by the French authorities, and valued on 123,848 Euros (b) the fishing gear , valued on 24,393 Euros (c) the fishing materials valued on 5,610 Euros , totalling 153,851 Euros , shall be considered as security to be held or, as the case may be, returned by France to this party.

8- To determine that the bond shall be in the form of a bank guarantee .

9.- To determine that the wording of the bank guarantee shall , among other things, state the following:

A.- In case France returns to the shipowner the items referred to under point 7 (of the present submissions):

"The bank guarantee it is issued in consideration of France releasing the Grand Prince , in relation to the incidents dealt with in the Order of 12 January 2.001 of the Court of First Instance of Saint-Paul and that the issuer undertakes and guarantees to pay to France such sums, up to 206,149 Euros , as may be determined by a final and firm judgement or decision of the appropriate domestic forum in France or by agreement of the parties. Payment under the guarantee would be due promptly after receipt by the issuer of a written demand by the

competent authority of France accompanied by a certified copy of the final and firm judgement or decision or agreement."

B.- In case France does not return to the shipowner the items referred to under point 7 (of the present submissions):

"The bank guarantee is issued in consideration of France releasing the Grand Prince , in relation to the incidents dealt with in the Order of 12 January 2001 of the Court of First Instance of Saint-Paul and that the issuer undertakes and guarantees to pay to France such sums, up to 52,298 Euros , as may be determined by a final and firm judgement or decision of the appropriate domestic forum in France or by agreement of the parties. Payment under the guarantee would be due promptly after receipt by the issuer of a written demand by the competent authority of France accompanied by a certified copy of the final and firm judgement or decision or agreement."

10.- To determine that the bank guarantee shall be invoked only if the monetary equivalent of the security held by France is not sufficient to pay the sums as may be determined by a final and firm judgement or decision of the appropriate domestic forum in France.

21st March , 2001

A handwritten signature in black ink, consisting of a stylized 'A' followed by a vertical line and a horizontal line, with the date '6/04/01' written to the right.

Alberto Renelas
As Agent for Belize.